

Exhibit "14"

After II v. Grande - Rule 30b6 Deposition Notice to Grande [IWOV-IDOCS.FID4036765]

Zachary C. Howenstine <ZHowenstine@atllp.com>

Wed 5/10/2023 6:18 AM

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When we spoke last week, I mentioned that Grande would be producing more documents, and that (at least in our view) it makes sense to complete those productions before proceeding with a Rule 30b6 deposition. Further to that point, I note that plaintiffs have served additional document requests to which Grande has not yet responded.

In any event, you suggested that the parties could proceed with a 30b6 deposition at least as to those topics pertaining to the data and documents Grande has produced regarding Grande's DMCA process. As we see it, those would be topics 2, 3, 4, 6, 17, and 18 (subject to the objections below). Please let me know if you disagree. Once we're on the same page about this, we will identify some potential deposition dates.

Additionally, as we discussed, Grande has some objections to the list of topics. Specifically:

1. Grande objects to all topics to the extent they seek information prior to April 2017, for substantially the reasons stated in Grande's January 27, 2023 opposition to plaintiffs' motion to compel (ECF No. 72). This means that Grande objects to topic 16 in its entirety. As discussed, we believe these objections are consistent with the court's motion to compel order, and we are in the process of obtaining the hearing transcript to confirm. Except as otherwise noted, Grande will provide a corporate designee to testify to the listed topics for the time period of April 2017 to present.
2. Grande objects to topic 6 as unduly burdensome, cumulative, and inappropriate for a Rule 30b6 deposition. Grande has already produced data from which plaintiffs can obtain the requested information for the period of April 2017 to present.
3. Grande objects to topics 7 and 8 as vague and unduly burdensome, and also as seeking information largely protected by attorney-client privilege or the work product doctrine. Grande would not object to producing one or more designees to testify about specific, responsive documents produced in discovery, but it is unreasonable to expect a Grande witness to be able to testify about all internal communications and deliberations about copyright infringement and safe harbor issues.
4. Grande objects to topic 30 as unduly burdensome and inappropriate for a Rule 30b6 deposition. It is unreasonable to expect a Grande witness to be able to provide detailed financial information in a deposition about hundreds or thousands of specific customer accounts.

Please let me know if you'd like to schedule a call to discuss.

Thanks,

Zach



Armstrong Teasdale LLP

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